

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001

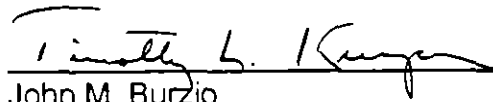
POSTAL RATE & FEE CHANGES, 1997

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Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS MODEN: TW/USPS-T4-22-25
(September 11, 1997)

Pursuant to sections 25 and 26 of the Rules of Practice, Time Warner Inc. (Time Warner) directs the following interrogatories to United States Postal Service witness Moden (USPS-T-4). If witness Moden is unable to respond to any interrogatory, we request that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

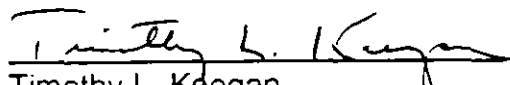

John M. Burzio
Timothy L. Keegan

Counsel for
TIME WARNER INC.

Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N. W.
Washington, D. C. 20007-4403
tel/(202) 965-4555
fax/(202) 965-4432

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Timothy L. Keegan

September 11, 1997

FOURTH SET OF INTERROGATORIES TO WITNESS MODEN (USPS-T-4)

TW/USPS-T4-22 Please refer to the Postal Inspection Service report named "National Coordination Audit - Allied Workhours" (December 1996) that is included in LR-H-236. The report refers, in the executive summary and at pages 10-12, to Regional Instruction (RI 399) issues. It defines RI 399 as "an understanding between the Postal Service and the clerk and mail handler unions regarding specific allied labor assignments" (Page 1, Footnote 2).

a. Does RI 399 refer to agreements that may differ between one part of the country and another? If they are different, how many different RI 399 agreements are there?

b. What are the most typical "RI 399 issues"? Do they, for example refer to what kind of work can be done by clerks and what can be done by mailhandlers? Do they refer to what can be done by casual and/or transitional employees? Please explain as fully as possible.

c. What kinds of restraints do RI 399 agreements place on management's ability to assign employees where they would be of most use at a given point in time? Please explain as fully as possible.

d. The report recommends, and USPS management appears to have concurred, that "a consistent approach toward RI 399 issues is needed to help minimize the impacts of local agreements on plant operations" (Page 11). Please explain what progress has been made in this area since the Inspection Service issued its report.

e. Please provide copies of typical RI 399 agreements and, if possible, provide copies of all such current agreements.

f. On page 12 the report refers to a study being undertaken by Headquarters Strategic Operations Planning, of costs per workhour, that it was hoped would "help to identify the true costs of craft work restrictions." AP 4, FY97 is indicated as the target date. Please indicate whether this study has been completed and if so, describe its findings. If there exists a written report, please provide a copy.

TW/USPS-T4-23 The Postal Inspection Service report "National Coordination Audit - Allied Workhours" (December 1966), included in LR-H-236, states, on page 19, in discussing problems with employees clocked into the wrong MODS operation:

"Supervisors had employees clock into a non-distribution operation at the beginning of their tour until the supervisor made individual work assignments."

It goes on to state:

"Employees used any timeclock and operation number that was convenient. In order to get 'on the clock' as soon as possible, employees used the first timeclock they came to when beginning their tour and returning from lunch. Clocking in on an opening unit operation number to get back on the clock inflated those workhours."

And it also states:

"Employees did not know what operation numbers they should be using. Employees clocked into an opening unit and found working elsewhere were unable to identify the operation number which corresponded to where they were working. Some supervisors were also unable to identify which operation numbers the employees should use."

a. Why is it important for an employee to get "on the clock" as soon as possible?

b. Is an employee's pay affected by how soon he gets "on the clock"? If the answer differs depending on whether the employee is full-time, part-time, transitional or casual, or on whether or not he works more than eight hours that day, please provide different answers for each case.

c. Please confirm that mail processing employees in MODS offices normally clock out when going to lunch and clock back in when they get back. If not confirmed, please explain.

d. What happens if an employee forgets to clock out before going to lunch? Will the MODS system assume that he went to lunch anyway? If yes, how long a lunch break will it assume that he took?

e. Is a given time-clock in a mail processing facility normally set to record one particular operation number? If yes, how easy is it to change that number and who is authorized to do so?

f. Can an employee use the clock at a 180 operation to clock into a 110 operation? If yes, what does he have to do?

g. In order to correctly record a move from one operation to another, does an employee have to first clock out, then in, or is it enough to clock into the new

operation?

- h. What does it mean to initiate a "move" to a given operation number?
- i. What exactly does an employee do when he clocks in or out of an operation?

TW/USPS-T4-24

- a. Do BMC's use a time-clock system similar to that used in MODS offices? If no, what do they use to keep track of employee time?
- b. Do Non-MODS offices use a time-clock system similar to that used in MODS offices? If no, what do they use to keep track of employee time? If yes, what do they do with the recorded data?
- c. For how many hours will a (1) full-time; (2) part-time; (3) casual; and (4) transitional employee be paid on a given day if the time-clock indicates that he worked 8 hours and 15 minutes? What if it shows he worked 8 hours and 45 minutes? What if it shows 7 hours and 45 minutes?
- d. What is the minimum increment of time for which a mail processing employee is paid on a given day?

TW/USPS-T4-25 The Postal Inspection Service report "National Coordination Audit - Allied Workhours" (December 1996), included in LR-H-236, discusses problems associated with the lack of performance indicators for allied labor (LDC 17) operations and argues that this often causes inadequate control of LDC 17 workhours. It states, for example, that

"LDC 17 supervisors generally expressed that their focus was to keep the employees in budgeted positions 'busy'" (page 10).

It recommends (pages 14-15) that

"productivity benchmarks should be developed for each LDC 17 operation that does not directly support mail distribution operations."

- a. For each type of letter, flat and parcel automated, mechanized and manual distribution operation, please describe the allied labor functions that "directly support" that type of distribution. Please also indicate which of those functions, in your experience, are currently being recorded in MODS as part of the respective distribution operations and which are currently normally recorded as part of LDC 17.

b. Please describe the allied labor (LDC 17) operations that do not "directly support" specific distribution operations. Please also identify the MODS operation numbers normally used for each such operation.

c. Is distribution of small (less than one pound) parcels generally performed as part of LDC 17 functions? If no, where is such distribution normally performed? What MODS operation numbers are normally used for distribution of small parcels?

d. Please describe the types of LDC functions that can be performed by clerks, the functions that can be performed by mailhandlers and the functions that can be performed by either craft. If this depends on the type of facility, or its geographic location, please explain fully.

e. Do all post offices where mail processing is performed use both clerks and mailhandlers? If no, describe the types of offices that use only clerks and those that use only mailhandlers.